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January 14, 2025

VIA ECF

The Honorable Magistrate Judge Lena D. Wettre
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07102

RE: Pietrocola v. Chelsea Senior Living, *et al.*
Docket No. 2:23-cv-21705
Our File No. 786-112201

Dear Judge Wettre:

The undersigned represents the Defendants, Chelsea Senior Living, LLC, Chris Slavicek, Edie Empirio, Roger Bernier, Kathy Merkel, and Scott Yaeger, in above matter.

Pursuant to the Court's Amended Scheduling Order of December 5, 2024, fact discovery is set to close in this matter on February 17, 2025. The parties have diligently attempted to complete the outstanding discovery, specifically, the depositions of defense witnesses but, due to the recent holidays and a variety of scheduling issues with this office and the witnesses, unfortunately have not been able to do the same.

As such, I am writing, with the consent of my adversary, to respectfully request that the Court extend this deadline by an additional sixty days until April 17, 2025, to give the parties time to complete the depositions in this matter.

The Court's courtesy and attention to this matter are greatly appreciated.

Very truly yours,

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

/s/ Justin A. Britton

Justin A. Britton, Esquire

JAB/nlo

cc: All counsel of record – via ECF

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